

EXHIBIT A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

MARIAN SNOW,

Plaintiff(s),

v.

GLOBAL CREDIT & COLLECTION
CORPORATION,

Defendant(s).

Civil Action No. 5:13-cv-721-FL

AFFIDAVIT OF JEFF CAREW

Provide
STATE OF Ontario)
)
COUNTY OF Canada)

NOW BEFORE ME, the undersigned authority, personally came and appeared

JEFF CAREW

who, after being duly sworn, did depose and state:

1. I am President for Global Credit & Collection Corporation ("GCC"). GCC is a debt collection agency engaged in the collection of unpaid debt by telephone and mail. As President, I am familiar with and have personal knowledge of GCC's business operations, including an understanding of account records used and maintained in the ordinary course of business. I have reviewed all of GCC's business records relating to Marian Gibbons' accounts and have personal knowledge as to GCC's collection efforts on the accounts.

2. On or about September 13, 2012, Citibank, N.A. placed a debt owed by plaintiff with GCC for collection (the "Account"). The Account was placed with a balance owed of \$5,306.32. A true and accurate copy of the Account records is attached as **Exhibit 1**, GCC Bates No. 0001 - 00014.

3. On September 13, 2012, GCC made a credit inquiry with Trans Union using plaintiff's social security number. GCC made the credit inquiry in relation to the

collection of her Citibank debt. The credit inquiry identified “Marian Snow” as another name for “Marian Gibbons.” *Id.*

4. On or about September 14, 2012, GCC mailed a letter to plaintiff advising her that GCC was attempting to collect the Citibank debt. The letter was never returned as undeliverable. A true and accurate copy of the September 14 letter is attached as **Exhibit 2**.

5. GCC identified telephone numbers 630-XXX-3335 (the “3335 Number”) and 630-XXX-8462 (the “8462 Number”) as belonging to plaintiff. Both numbers bear a 630 area code, which is in the Chicago, IL metro area. *See* Exhibit 1, GCC 00001 - 00014.

6. On September 18, 2012, GCC employee Michelle Cote called the 8462 Number, the line did not ring and went straight to voicemail. In an attempt to get a line that rang, she hung up and called back but again reached voicemail without getting a line that rang. Mrs. Cote left a live voice message for plaintiff at the 8462 Number. The September 18 calls were manually dialed by the employee physically pressing every digit of the telephone number on a black desk telephone, model Avaya 4610sw ip, in order to place the call. GCC did not use equipment with the capacity to store or produce telephone numbers to be called, using a random or sequential number generator; and to dial such numbers. *Id.*; **Exhibit 3**, recordings of calls to the 8462 Number.

7. On September 24, 2012, GCC employee Michelle Cote called the 8462 Number and did not leave a message. The call was manually dialed by the employee physically pressing every digit on a black desk telephone, model Avaya 4610sw ip, in order to place the call. GCC did not use equipment with the capacity to store or produce telephone numbers to be called, using a random or sequential number generator; and to dial such numbers. *Id.*

8. Employee Michael Tam placed 5 calls to the 8462 Number (10/17/12; 10/30/12; 11/6/12; 11/13/12; 11/19/12). Each call was manually dialed by the employee physically pressing every digit of the telephone number on a black desk telephone, model Avaya 4610sw ip, in order to place the call. The employee left a message on each call. GCC did not use equipment with the capacity to store or produce telephone numbers to be called, using a random or sequential number generator; and to dial such numbers. *Id.*

9. On December 11, 2012, GCC’s auto-dialing system attempted to call the 8462 Number. *Id.*

10. GCC never spoke with anyone on any calls to the 8462 Number. GCC never received a return call from the plaintiff or anyone else. Every call GCC placed to the 8462 Number went straight to voicemail and did not ring. *Id.*

11. GCC was never advised, learned, or had reason to believe that plaintiff was or may have been charged for any of GCC's calls.

12. GCC placed 10 calls to the 3335 Number between September 13, 2012 and October 30, 2012. None of the calls were ever answered and GCC never spoke with anyone as a result of any calls to the 3335 Number. *Id.*

13. On October 23, 2012, having failed to contact plaintiff, GCC identified 252-XXX-1572 as a possible number for Brett Standifer. GCC placed 4 calls to the 1572 Number between October 23, 2012 and November 19, 2012. None of the calls were ever answered and GCC never spoke with anyone as a result of any calls to the 1572 Number. *Id.*

14. GCC has written policies prohibiting its employees from disclosing a debt to a third party. **Exhibit 4.**



JEFF CAREW

SWORN TO AND SUBSCRIBED BEFORE ME

ON THIS 19th DAY OF June, 2015.



NOTARY PUBLIC

My Commission Expires: N/A